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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

NEVADA REAL ESTATE CORP., a Nevada
corporation,

Plaintiff,

vs.

RAMON WU, an individual; CHUN MEI
XIAO a/k/a KAREN XIAO, an individual; and
O'HARMONY REALTY LLC, a Nevada
limited liability company;

Defendants.

Case No.: 2:12-cv-01896-JAD-PAL

**PLAINTIFF NEVADA REAL ESTATE
CORP.'S NOTICE OF ACCEPTANCE
OF OFFER OF JUDGMENT
PURSUANT TO FEDERAL RULES OF
CIVIL PROCEDURE 68**

Plaintiff Nevada Real Estate Corp. ("Plaintiff"), by and through its attorneys, Weide & Miller, Ltd., hereby accepts the entry of judgment to be taken against Defendants Ramon Wu, Chun Mei Xiao a/k/a Karen Xiao, and O'Harmony Realty, LLC, pursuant to Fed. R. Civ. P. 68.

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1 The terms of the Judgment are set forth in Defendants' Offer of Judgment to Plaintiff, a
2 true and correct copy of which is attached hereto as Exhibit A, which was received by Plaintiff
3 Nevada Real Estate Corp. via electronic mail on August 13, 2013, and via overnight courier on
4 August 14, 2013.

5
6 DATED this 14th day of August, 2013.

7
8 **WEIDE & MILLER, LTD.**

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10 _____
11 Ryan Gile, Esq.
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13 7251 W. Lake Mead Blvd., Suite 530
14 Las Vegas, NV 89128
15 Attorneys for Plaintiff
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CERTIFICATE OF SERVICE

I hereby certify that I am an employee of Weide & Miller, Ltd. and that on August 14, 2013, I served a full, true and correct copy of the foregoing **PLAINTIFF NEVADA REAL ESTATE CORP.'S NOTICE OF ACCEPTANCE OF OFFER OF JUDGMENT PURSUANT TO FEDERAL RULES OF CIVIL PROCEDURE 68** via the Court's CM/ECF filing system upon the following:

Mark E. Ferrario, Esq.
Tyler R. Andrews, Esq.
GREENBERG TRAUIG LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, NV 89169

Attorneys for Defendants

/s/ Ryan Gile
An employee of WEIDE & MILLER, LTD.

EXHIBIT A

EXHIBIT A

GREENBERG TRAUIG, LLP
3773 Howard Hughes Parkway
Suite 400 North
Las Vegas, Nevada 89169
Telephone: (702) 792-3773
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OOJ
MARK E. FERRARIO
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Attorneys for Defendants

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

NEVADA REAL ESTATE CORP., a Nevada
corporation,

Plaintiff,

v.

RAMON WU, an individual; CHUN MEI XIAO a/k/a
KAREN XIAO, an individual; and O'HARMONY
REALTY LLC, a Nevada limited liability company,

Defendants.

Case No.: 2:12-cv-01896-GMN-PAL

**DEFENDANTS' OFFER OF
JUDGMENT TO PLAINTIFF**

**TO: PLAINTIFF NEVADA REAL ESTATE CORP. AND ITS ATTORNEYS OF
RECORD**

Pursuant to Nevada Revised Statute 17.115 and Rule 68 of the Federal Rules of Civil Procedure, Defendants RAMON WU, CHUN MEI XIAO a/k/a KAREN XIAO, and O'HARMONY REALTY LLC ("Defendants"), jointly and severally, by and through their attorneys of record, the law firm of Greenberg Traurig LLP, hereby offer to allow judgment to be taken against them and in favor of Plaintiff in the amount of **\$33,000.00**, as full and complete satisfaction of Plaintiff's claims, inclusive of all accrued interest, costs, attorneys' fees, and any other sums that could be claimed by Plaintiff against Defendants in the above-captioned action.

OFFER OF JUDGMENT

1 This Offer of Judgment is made solely for the purposes specified in Federal Rule of Civil
2 Procedure 68 and N.R.S. § 17.115 and is not to be construed as either an admission of liability in
3 this action or an admission that Plaintiff may have suffered any damage. This Offer of Judgment
4 shall automatically expire if not accepted by Defendant within ten (10) days from the date of
5 service hereof.

6 Dated this 13th day of August, 2013

8 GREENBERG TRAURIG, LLP

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11 _____
12 MARK E. FERRARIO, ESQ.
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28 OFFER OF JUDGMENT

CERTIFICATE OF SERVICE

I hereby certify that on the 13th of August, 2013, I served the foregoing **DEFENDANTS'**

OFFER OF JUDGMENT upon:

Ryan Gile, Esq.
Weide & Miller, Ltd.
5th Floor, Bank of Nevada Building
7251 West Lake Mead Blvd, Suite 530
Counsel for Plaintiff

by causing a full, true, and correct copy thereof to be sent by the following indicated method or methods, on the date set forth below:

by mailing in a sealed, first class postage-prepaid envelop, addressed to the last-known office address of the attorney, and deposited with the United States Postal Service in Las Vegas, Nevada.

- ☐ by hand delivery.
- ☒ by sending via overnight courier in a sealed envelope.
- ☐ by faxing to the attorney at the fax number that is the last-known fax number.
- ☒ by electronic mail to the last known e-mail address.

/s/ Christina Bonner

AN EMPLOYEE OF GREENBERG TRAURIG, LLP

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OFFER OF JUDGMENT